

Declaration of Stephen Bouffard

I, Stephen Bouffard, declare that the following is based upon my personal, firsthand knowledge that I can testify to and that if I were called to testify, my testimony would be:

1. I am the Director of Strategic Initiatives Unit with the Cook County Sheriff's Office. I have been employed by the Sheriff's Office for 21 years. I have been in charge of all of the video operations of the Cook County Sheriff's Office since 2013.
2. As the Director of the Strategic Initiatives Unit, my responsibilities include the maintenance of all the video operations for the Cook County Sheriff's Office, including at the Cook County Jail and all Cook County courthouses.
3. I am aware of the lawsuit *Alicea, et al., v. Cook County, et al.*, case number 18 C 5381. I am aware generally of the allegation that there is videotaping or video monitoring of detainees at the Cook County Jail and Cook County courthouses in the holding cells at all of these locations.
4. I am aware that a request has been made for the Cook County Sheriff's Department to preserve all video surveillance recordings of each of the holding cells in all Cook County courthouses.
5. There are approximately 2,000 video surveillance cameras in the Cook County courthouses and the Cook County Department of Corrections. The video surveillance system at all Cook County courthouses preserves footage for a 30 day period on a rolling basis. This 30 day video retention period was approved by the Cook County Local Records Commission. After 30 days, the system begins to overwrite prior footage in real time. For example, on August 31, 2018 at 1:15 p.m., the footage from July 31, 2018 at 1:14 p.m. will cease to exist. The system is automated and cannot be adjusted to increase the retention time period.
6. There are two types of cameras at the Cook County courthouses: Panasonic and Genetec. There are 127 Panasonic cameras at the Markham, Rolling Meadows, Skokie and Maywood courthouses and the 24-hour lockup at the Maywood Sheriff's Office. Each of these locations has a set number of DVRs, which are needed to download footage from each video camera. Footage can only be downloaded from each camera in 15 minute increments and each 15 minute portion takes five minutes to download. Only one person can download from a DVR at a time, so the total time required to download just 24 hours of footage would actually be 1,016 hours. For a thirty day period, this would equate to 30,480 hours that Sheriff employees would spend downloading this footage.
7. There are 144 Genetec cameras at the Bridgeview, Rolling Meadows, Skokie and Maywood courthouses, as well as at the Criminal Courts Building (Leighton Courthouse) and the Daley Center. Genetec cameras record in high-definition and thus require more storage space than the Panasonic cameras, which record in standard definition. Over a 30-day period, approximately 56 terabytes are recorded on Genetec cameras. To illustrate the amount of storage at issue, the largest currently available hard drive stores 4 terabytes.

8. In order to download and preserve the requested footage, and given the time and physical limitations of the video surveillance system at the Cook County courthouses, it would take 672 hours to download and preserve footage from all Cook County courthouses for just one 24-hour period.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 13 AUG 18


Stephen Bouffard